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**GOVERNOR'S COORDINATION AND  
SPECIAL SERVICES PLAN**

**STATE OF CALIFORNIA**

**for the period**

**Program Years 1998 and 1999**

|                            |   |
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| <b>NAME OF GRANTEE:</b>    | <b><i>Governor Pete Wilson</i></b>                |
| <b>ADDRESS OF GRANTEE:</b> | <b><i>State Capitol, Sacramento, CA 95814</i></b> |
| <b>DATE OF SUBMISSION:</b> | <b><i>May 15, 1998</i></b>                        |

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## ***PREFACE***

The Governor's Coordination and Special Services Plan (GCSSP) describes the proposed use of resources available to the State of California under the Job Training Partnership Act (JTPA) for employment and training programs and services for a two-year period. The plan includes oversight and support activities, priorities and criteria for incentive grants, and performance goals for state-supported programs. The plan is required by Section 121 of the JTPA and Section 10522 of the California Unemployment Insurance Code. The State Job Training Coordination Council (SJTCC) prepares the plan for the Governor's consideration and approval. State receipt of federal JTPA funds is contingent upon the plan being approved by the Secretary of Labor.

The GCSSP consists of seven sections:

- I. State Workforce Development Structure
- II. Program Planning Information
- III. Projected Use of Resources
- IV. Performance Standards
- V. Procurement Procedures
- VI. Certifications
- VII. Dislocated Worker Program (Title III)

The attached document includes the first six sections of the GCSSP. Information pertaining to the evaluation of the previous two-year's JTPA experience, the projected use of resources, and performance standards refers to JTPA Title II. Information pertaining to the Title III program has been submitted under separate cover.

The Goals and Objectives and the Coordination Criteria found in Section II have been developed by the SJTCC through public Committee and Council meetings. The description in Section III. 4. of the projected use of JTPA State Education Coordination and Grants is being prepared by the Superintendent of Public Instruction, in collaboration with the Chancellor's Office of the California Community Colleges (COCCC) and the SJTCC (acting on behalf of the Governor's Office). The Employment

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Development Department (EDD), under guidance from the SJTCC, prepared the remaining sections of the GCSSP.

The GCSSP is a document applicable to programs and services funded under the JTPA, employment and training services provided under the Wagner-Peyser Act, certain provisions of the Carl D. Perkins Vocational and Applied Technology Act, and others. The goals and objectives have been developed as long-range strategic statewide goals and objectives that can be applied to all state, regional, and local workforce preparation programs. These are intended to further the vision that *California will have a highly-skilled and well-educated workforce*. Unless otherwise provided by law, the goals and objectives are presented as guidance, and are not intended to supplant or supersede any goals and objectives that state, regional, and local agencies may develop in response to their respective mandates.

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## **I. STATE WORKFORCE DEVELOPMENT STRUCTURE**

- A. Describe the state's organizational structure for workforce development programs and systems. Include an identification of the state agency(ies) responsible for each JTPA title (including Dislocated Workers Unit), the Employment Service, Unemployment Insurance (UI), the Trade Adjustment Assistance (TAA) program, and North American Free Trade Agreement (NAFTA)/TAA. Where different state agencies have administrative responsibility for TAA and JTPA, describe the provisions of the interagency agreement or include a copy as an attachment to the plan.**

California's current workforce preparation system comprises over 20 programs, administered by 14 different state entities, and serving millions of persons each year. The system encompasses training, vocational education, and vocational rehabilitation programs, as well as the Community Colleges, the California State University, and the University of California.

The EDD oversees many of California's workforce preparation programs. The EDD is the state's administrative entity for the Employment Service, the UI program, the TAA program, and the NAFTA/TAA. Additionally, the EDD's Director has created the Workforce Development Branch (WDB), which provides administrative oversight and support for various federal workforce preparation programs and initiatives including the JTPA (Titles II and III) and Welfare-to-Work (WtW) programs, as well as the One-Stop Career Center and School-to-Career systems.

As part of their administrative role, the WDB provides direct support to three policy bodies: the SJTCC, the One-Stop Career Center System Task Force, and the School-to-Career Advisory Council. The WDB provides broad workforce preparation policy analysis and recommendations for use by policy councils, EDD, California's Health and Welfare Agency, and the California administration. The WDB is responsible for implementing the State's education and job training report card system that is mandated by Senate Bill 645. Additionally, the WDB is active in building the collaborative partnerships with federal, state, and local partners to facilitate the development of a workforce preparation system that is responsive to the need of California's employers and job seekers.

- B. Provide an evaluation of the preceding two years' experience with JTPA program activities. The description should include how these results have guided decisions made regarding the activities to be funded.**

**Statewide Performance Standards Achievement — Program Year (PY) 1995-96 and PY 1996-97.**

|                           | PY 1995-96        |                      |          | PY 1996-97        |                      |          |
|---------------------------|-------------------|----------------------|----------|-------------------|----------------------|----------|
|                           | Adjusted Standard | Performance Outcomes | Variance | Adjusted Standard | Performance Outcomes | Variance |
| Adult Measures            |                   |                      |          |                   |                      |          |
| Follow-Up Employment Rate | 53.06             | 60.30                | 7.24     | 54.70             | 62.60                | 7.90     |
| Follow-Up Weekly Earnings | 252.97            | 312.00               | 23.33    | 281.00            | 335.00               | 19.22    |

|                           | PY 1995-96        |                      |          | PY 1996-97        |                      |          |
|---------------------------|-------------------|----------------------|----------|-------------------|----------------------|----------|
|                           | Adjusted Standard | Performance Outcomes | Variance | Adjusted Standard | Performance Outcomes | Variance |
| Adult Welfare Measures    |                   |                      |          |                   |                      |          |
| Follow-Up Employment Rate | 45.10             | 53.80                | 8.70     | 41.02             | 58.10                | 17.08    |
| Follow-Up Weekly Earnings | 240.32            | 294.00               | 22.33    | 239.34            | 303.00               | 26.60    |

|                                | PY 1995-96        |                      |          | PY 1996-97        |                      |          |
|--------------------------------|-------------------|----------------------|----------|-------------------|----------------------|----------|
|                                | Adjusted Standard | Performance Outcomes | Variance | Adjusted Standard | Performance Outcomes | Variance |
| Youth Measures                 |                   |                      |          |                   |                      |          |
| Entered Employment Rate        | 38.14             | 39.61                | 1.47     | 37.77             | 45.25                | 7.48     |
| Employability Enhancement Rate | 43.83             | 63.61                | 19.78    | 48.68             | 65.45                | 16.77    |

| Participants Served | 77% Adult | 82% Youth | 5% Older Worker | 5% Incentive | 8%     | II-B   | III    |
|---------------------|-----------|-----------|-----------------|--------------|--------|--------|--------|
| PY 1995-96          | 38,072    | 19,906    | 2,591           | 2,155        | 25,220 | 72,137 | 58,849 |
| PY 1996-97          | 36,195    | 15,954    | 2,502           | 1,324        | 15,828 | 61,285 | 59,799 |
| Entered Employment  | 77% Adult | 82% Youth | 5% Older Worker | 5% Incentive | 8%     | II-B   | III    |
| PY 1995-96          | 13,070    | 5,397     | 1,043           | 251          | 527    | 796    | 22,038 |
| PY 1996-97          | 12,837    | 4,235     | 991             | 184          | 364    | 727    | 25,341 |

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California's JTPA program is locally driven. Each of the state's 52 Private Industry Councils (PIC) is responsible for customizing the program to meet the unique needs of its Service Delivery Area (SDA). The PICs' success in designing effective local programs is evidenced by their continued performance improvement. For example, during Program Year 1995-96, 43 PICs exceeded five or six of the national JTPA performance standards, while eight PICs exceeded four of the standards. One PIC failed performance standards that year. During the 1996-97 program year, 49 California PICs exceeded five or six of the performance standards, while three PICs exceeded four of the standards. There were no performance standards failures during the 1996-97 program year.

In order to help avert performance standards failure, the WDB's Job Training Partnership Division (JTPD) has implemented procedures to allow for tracking PIC performance during a given program year.

The Data Analysis Unit (DAU) within the JTPD monitors performance standards and performance outcomes and annually computes final incentive awards for eligible PICs. PICs at risk of failing performance standards are required to submit a corrective action plan through a Technical Assistance (TA) Plan outlining specific steps the PIC will take to improve performance. The DAU analyzes the TA plan to ensure it addresses the mutually identified problems before release of TA funds. State program managers follow-up with the SDA administrative entities to ensure that corrective action steps are being followed and that they are effective in improving performance.

## **II. PROGRAM PLANNING INFORMATION**

### **A. Goals and Objectives**

- 1. Provide the workforce development goals and objectives which are provided by the state to the SDA/Substate Areas (SSA) as guidelines in the preparation of local workforce development plans. The description should provide the goals and objectives established to provide statewide guidance for the JTPA SDA/SSA Title II-A, Title II-B, and Title II-C programs.***

#### **GOALS AND OBJECTIVES FOR CALIFORNIA'S JOB TRAINING AND PLACEMENT PROGRAMS FOR PROGRAM YEARS 1998-1999**

This statement of goals and objectives is meant to provide guidance to state agencies, local officials, and PICs in the formulation of their plans for



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the delivery of federal and state-funded job training and placement services. These goals and objectives are not intended to dictate policy to local authorities and programs, but to define the overall policy framework for the use of public resources. These should be liberally interpreted and applied so as to further the vision and mission statements for California's workforce preparation system:

### *The Vision*

*California will have a highly-skilled and well-educated workforce that enhances the State's competitive advantage in the global economy.*

### *The Mission*

*Strong collaboration between public and private partnerships will ensure that:*

- California employers will be able to recruit, train, and retrain a workforce possessing the skills needed to compete in a global economy, and*
- Workers will have the lifelong tools necessary to prepare for viable jobs and flexible careers.*

*California's social and economic future will be assured by creating and building an education, employment, and training system which will be accountable, fully integrated, and adaptable.*

Two major initiatives, California's School-to-Career Vision, and California's Vision for a One-Stop Career Centers System, which received wide public input and were embraced by the SJTCC, provide an additional broad policy framework to encourage the coordination and integration of service delivery to enhance the opportunities for education and employment of youths and adults.

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## GOALS AND OBJECTIVES

The following goals and objectives for California's workforce preparation system have been developed to: (1) provide common statewide strategic guidance applicable to all state, regional, and local workforce preparation programs, (2) provide guidelines for improving coordination and delivery of services among these respective programs, and (3) identify priorities and program emphasis for state, regional, and local agencies involved in job training and vocational education programs. These goals and objectives provide benchmarks for future evaluation of state, regional, and local workforce preparation programs.

The strategic, long-range goals for the California workforce preparation system are:

1. Ensure private sector influence and focused participation in the workforce preparation system at the state, regional, and local levels.
2. Ensure workforce preparation programs and economic development activities are effectively linked to enhance California's global competitiveness.
3. Ensure California's existing and potential workforce has the necessary education, employment readiness, and technical skills for employment and the opportunities for life-long learning to support job retention and career advancement.
4. Ensure access, minimize barriers, and communicate benefits of the system to all potential users.
5. Foster effective coordination/collaboration of the education, employment, training, social services, and economic development programs at the state, regional, and local levels.
6. Continuously improve the quality, effectiveness, and efficiency of services provided to customers.
7. Ensure workforce preparation resources are efficiently and effectively used in support of California's WtW initiatives.

A detailed explanation of each goal follows, together with associated objectives and examples of performance measurement areas for identifying progress in the attainment of the goals and objectives.

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## *1. PRIVATE SECTOR INVOLVEMENT AND LEADERSHIP*

Private sector involvement is essential because it is the private sector (business and labor) that will employ most of the graduates of programs provided through the workforce preparation system. The participation of the private sector helps to ensure that the critical skills and competencies necessary for workforce competitiveness are properly defined and continuously updated.

Goal:

Ensure private sector influence and focused participation in the workforce preparation system at the state, regional, and local levels.

Objectives:

- Create a dynamic, system-wide, results-oriented dialogue with the private sector to understand and respond to industry's changing needs for worker skills.
- Involve private sector leaders at the state, regional, and local levels.
- Increase awareness of and enthusiasm about system benefits within private sector through targeted marketing.

Potential Performance Measurement Categories:

- Private sector satisfaction
- Increased awareness among current and potential employers

## *2. LINKAGES WITH ECONOMIC DEVELOPMENT*

Workforce preparation is an economic development tool that is essential in supporting and expanding local and regional economies. Workforce preparation programs and economic development activities should be linked in a manner whereby current and potential job opportunities drive job training programs. This increases the likelihood that participants will obtain jobs related to their training and that employers will have a prepared, competitive workforce.

Goal:

Ensure workforce preparation programs and economic development activities are effectively linked to enhance California's global competitiveness.

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Objectives:

- Utilize appropriate data to identify education and training needs in growing market segments.
- Ensure flexibility and responsiveness in order to support emerging industries in a timely manner.
- Encourage and support job retention.

Potential Performance Measurement Categories:

- Linkage with economic development activities
- Job retention
- Industry competitiveness

### 3. *WORKFORCE SKILLS DEVELOPMENT*

Ongoing skills improvement is necessary for California industries to maintain a leadership position in the global economy, and for creating opportunities for workers to share in future economic growth. Possession of core skills in literacy, math, critical thinking, creativity, and computer literacy are imperative for individuals to compete, or even survive, in the workplace. Additionally, possession of workplace skills, including conflict resolution, the ability to understand instructions, to communicate clearly and to work together in groups, and the self-confidence to respond to change are essential for a creative, flexible workforce. State, regional, and local workforce preparation programs should assess new entrants and reentrants to the workforce for critical skill deficiencies and provide services (or referral to services) that will enable individuals to acquire necessary skills/knowledge.

Goal:

Ensure California's existing and potential workforce has the necessary education, employment readiness, and technical skills for employment and the opportunities for life-long learning to support job retention and career advancement.

Objectives:

- Increase individual awareness of links between skills and jobs.

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- Within the public education arena, utilize skill and proficiency level standards.
  - Ensure that training programs throughout the state meet the needs of various types of workers (high school students, displaced workers, reentry workers, unskilled workers, mid-level workers, etc.), and that the programs include instructional strategies to help these students succeed in the programs.

Potential Performance Measurement Categories:

- Skill and proficiency standards
- Number of workers chronically under-employed or unemployed due to inadequate skills

#### 4. ACCESS

California's workforce preparation system must be designed to guarantee universal access to all customers. That guarantee is meaningful only if potential customers are aware of the existence and benefits of the system and have realistic and reasonable opportunities to access the system. Universal access assures that all employers seeking employees and all individuals seeking employment can have their needs considered. [Note: Access to services does not mean entitlement to services. Available resources, legal mandates, and public policy determine the extent to which specific services are provided.]

Goal:

Ensure access, minimize barriers, and communicate benefits of the system to all potential users.

Objectives:

- Enhance awareness and understanding of system.
- Increase access for disenfranchised individuals.

Potential Performance Measurement Categories:

- Total number of individuals served
- Total number of individuals served as a percentage of the total estimated population to be served.

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- Characteristics of individuals served and not served
  - Surveys to measure knowledge of system

#### *5. COORDINATION/COLLABORATION*

The current system of education, employment, training, social services, and economic development programs has led to a disconnected array of programs and services within the workforce preparation system. Coordination of resources and collaboration in purpose can create effective partnerships for overcoming identified weaknesses.

Goal:

Foster effective coordination/collaboration of the education, employment, training, social services, and economic development programs at the state, regional, and local levels.

Objectives:

- Increase opportunities for coordination/collaboration.
- Enhance qualitative return on dollars expended or cost incurred.
- Reduce unnecessary duplication of effort.
- Improve the overall services delivered.

Potential Performance Measurement Categories:

- Total number of individuals served
- Benefit-cost ratios which reflect similarities and differences among programs
- Surveys to identify reduction in duplication of effort

#### *6. CONTINUOUS IMPROVEMENT*

To be effective, workforce preparation services must be available to customers at the time and at the quality those services are needed. Customers' needs are not constant; they are ever-changing in response to the dynamics of the economy and personal environments. By implementing a program of continuous improvement that is focused on services provided to customers, the workforce preparation system can be more responsive to customers' needs.

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Goal:

Continuously improve the quality, effectiveness, and efficiency of services provided to customers.

Objectives:

- Establish baseline data on the quality of each type of workforce preparation service.
- Formulate and achieve target measures for quality and service to all customers.
- Identify and use best available tools and resources employed by other organizations for continuous improvement.
- Improve and expand feedback processes.

Potential Performance Measurement Categories:

- Benchmarking for timely and cost-effective services
- Benchmarking for resource utilization
- Customer satisfaction surveys and other feedback mechanisms

## ***7. WELFARE REFORM***

Welfare reform will affect all levels of government in which welfare recipients reside. Public and private employers will need to hire large numbers of welfare recipients in order to meet federally required work participation rates. Failure to achieve these rates will have adverse fiscal implications.

Goal:

Ensure workforce preparation resources are efficiently and effectively used in support of California's WtW initiatives.

Objective:

- Target resources to support the WtW initiatives, within the flexibility allowed by law.

Potential Performance Measurement Category:

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- Jobs obtained, jobs retained, job advancements, and services provided to potential and actual welfare populations

**2. *The goals established by the Governor must include goals for the training of women in nontraditional employment and training-related placement of women in nontraditional employment and apprenticeship through funds available under the JTPA, the Carl D. Perkins Vocational and Applied Technology Education Act, and other sources of federal support.***

The state's goals for the training of women in nontraditional employment and the training related placement of women in nontraditional employment pursuant to JTPA Section 121(b)(4) and Title 20 Code of Federal Regulations (CFR) 628.205(a)(2) are to recognize the significant employment potential of women in nontraditional occupations and to recruit and train more women for placement into such occupations in order that their skills and talents may contribute further to the competitive advantage of California's workforce. In order to accomplish these goals, the state intends to promote among women the awareness of and employment in nontraditional occupations. Job training and educational programs will be encouraged to conduct campaigns to stimulate the general interest among women in exploring careers and available training in nontraditional occupations. Labor market information programs and systems will be encouraged to identify qualifying occupations in which women make up less than 25 percent of the employed workforce. The state will encourage the development and replication of programs designed to address the barriers to placement and retention of women in nontraditional employment.

At the local level, each PIC is required (through instructions issued by the state in the Handbook of Instructions for preparing the local job training plan) to:

- (a) Review prior year goals for training and placement of women in nontraditional occupations in the SDA to be used as the basis for setting numerical goals for PY 1998 and 1999.
- (b) Identify and list occupations (in particular, demand occupations) in the SDA which meet the definition of nontraditional. Include the average wage or wage range for the occupation and indicate if the identified occupation is in demand in the labor market area.
- (c) Establish numeric goals for training of women in nontraditional occupations and determine the percentage that number represents of



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all women trained within the SDA. Also calculate the percent increase (if applicable) of the new goal over the prior year.

- (d) Establish numeric goals for placement of women in nontraditional occupations and apprenticeships and determine the percentage that number represents of all women placed within the SDA. Also calculate the percent increase (if applicable) of the new goal over the prior year.
- (e) Describe efforts to accomplish the goals established. Such efforts could include participation in demonstration projects that focus on training and placement of women in nontraditional employment.

**3. *The goals to be achieved in the school-to-work transition programs specified in Section 123(a)(2)(A), the goals to be achieved in the literacy and lifelong learning programs specified in Section 123(a)(2)(B) and the goals to be achieved in the nontraditional employment for women programs specified in Section 123(a)(2)(C).***

The California Department of Education, in conjunction with the COCCC, is formulating plans regarding the above noted programs. The specific goals to be achieved in these programs will be forwarded to the U.S. Department of Labor (DOL) as an addendum to the GCSSP.

**B. *Statewide Coordination Criteria***

- 1. *Provide a discussion of the state's criteria for coordinating workforce development activities. Include a description of the specific areas of coordination among the programs and how services are coordinated with JTPA programs (Title II-A, B, and C, and Title III) for each of the following: state and local education agencies (including vocational education agencies), local public assistance agencies, the employment service, rehabilitation agencies, post-secondary institutions, economic development agencies, Department of Housing and Urban Development's Public and Indian Housing programs and programs for the homeless, as well as such other programs as the Governor determines to have a direct interest in employment and training and human resources utilization within the state. Describe how this coordination assists SDAs/SSAs.***

**OVERVIEW**

It is the basic goal of the State of California that all employment, training, and education programs be planned, coordinated, and delivered in a manner that supports the need of California for a highly-skilled, well-

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educated workforce. It is a further goal that these programs, to the degree possible, integrate resources and jointly plan common systems for the provision of nonduplicative services to meet the diverse needs of the eligible population, employers, and the current and emerging workforce. The coordination criteria contained herein is intended to foster effective coordination/collaboration between and among JTPA programs and other education, employment, training, social services, and economic development programs operating at the state, regional, and local levels.

To this end, programs and activities funded by the JTPA need to be developed in coordination with local EDD offices, welfare departments, vocational education agencies including the educational components of the state's youth and adult correctional agencies, service providers, employer and labor communities, and other human resource organizations at the state, regional, and local levels. Moreover, programs and activities funded by the JTPA are encouraged to support the statewide implementation of California's One-Stop Career Centers System and School-to-Career partnerships consistent with California's vision. Through the development and implementation of local One-Stop Career Center systems, California will continue to make progress in moving toward integration of service delivery.

#### COORDINATION CRITERIA

As required by JTPA Section 122(b)(3), each job training plan submitted by the PIC of a local SDA will be reviewed by the SJTCC for the purpose of

certifying to the Governor the consistency of the plan with the coordination criteria published below. As required by JTPA Section 122(b)(8), each plan of state agencies providing employment, training, and related services will be reviewed by the SJTCC for comment to the Governor. The SJTCC will comment on the extent to which state plans are consistent with applicable coordination criteria.

##### (a) PIC Responsibilities:

(1) The PIC is responsible for providing policy guidance for the development of the local job training plan. The PIC will:

(A) Be involved in all stages of program planning, policy setting, oversight, evaluation, and implementation to ensure that JTPA programs reflect the needs of the employer and labor communities and that education and training are provided in demand and growing occupations.

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- (B) Adopt procedures and methodologies for notifying public and private representatives of other employment and training, placement, vocational education, and social service programs of the start and the agenda for the planning process; actively involving those representatives in the development of the Job Training Plan; and assuring that all local employment and training and vocational education resources are considered in developing the plan.
  - (C) Assure that all JTPA programs under Title II and Title III are made available to the eligible populations in the SDA, and determine whether to permit services to homeless individuals who cannot prove residence within the SDA.
  - (D) Send copies of the approved plan to the vocational education governing boards serving the SDA.
- (2) The PIC has responsibility for commenting on local applications for vocational education funds during their development. Such applications are to describe methods to be used to coordinate vocational education services with relevant programs conducted under JTPA.
  - (3) The PIC may have additional coordination responsibilities delegated by recent welfare reform initiatives, including the Personal Responsibility and Work Opportunity Act of 1996, Welfare-to-Work Grants to States (Section 5001 of the Balanced Budget Act of 1997), and the California Work Opportunity and Responsibility to Kids (CalWORKs).
- (b) SDA Responsibilities:
- (1) Programs operated by an SDA will be objectively evaluated on their responsiveness to client, employer, and other local needs and linkages with service providers, economic development, and School-to-Career system reform efforts. Evaluations will, to the extent feasible, include comments from clients, employers, and service providers. A needs assessment based on current labor market information will be conducted, and appropriate linkages will be established with service providers to respond to those needs. The needs assessment will consider the eligible population's need for child care and other supportive services and will identify organizations that provide these services.

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- (2) Programs operated by an SDA under JTPA need to be coordinated as much as possible with employment and training programs operated by the EDD under the Wagner-Peyser Act. The SDA entity and local EDD Job Service (JS) office(s) shall jointly plan for the coordinated provision of services to common employers and clients and, as appropriate, jointly develop projects that serve identified community needs.
- (3) If there is more than one SDA in a single labor market area, agreements must be established providing for coordination among SDA programs, including:
- (A) Assessments of needs and problems in the labor market area that form the basis for program planning; and
  - (B) Coordinated or joint implementation of job development, placement, and other employer outreach activities.
- (4) If the County Welfare Department (CWD) covers more than one SDA or the SDA encompasses more than one county, the SDA entity must coordinate with the other SDAs and the CWD(s) in the development of procedures for the referral and enrollment of welfare recipients and for the sharing of program and client information.
- (5) The SDA entity may have additional coordination responsibilities delegated by recent welfare reform initiatives, including the Personal Responsibility and Work Opportunity Act of 1996, Welfare-to-Work Grants to States (Section 5001 of the Balanced Budget Act of 1997), and the CalWORKs program.
- (c) JTPA Program Responsibilities:
- (1) The JTPA Title III Dislocated Worker programs are to be coordinated with other state, regional, and local retraining programs, including programs and services provided by the JS, the Trade and Commerce Agency, and the Employment Training Panel. All such programs will involve affected labor organizations, local educational agencies, employers, local government, economic development corporations, community-based organizations, and interested individuals.
- A coordinated response to plant closures or mass layoffs is necessary. The Title III substate grantee will develop and implement a site-specific plan based on an assessment of the needs of the employer and the affected workers. The plan will assure maximum
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coordination among agencies serving dislocated workers, and will include methods for identifying and notifying such agencies of pending/actual plant closures and mass layoffs for developing joint funding approaches to address the problem.

- (2) The JTPA Titles II and III programs are to be coordinated with the JS, local education, CWDs, and JTPA Title II-A (8%) State Education Coordination and Grants programs, to benefit participants in California's WtW initiatives.
- (3) The universal need for accurate and timely labor market information requires that all employment, training, and education providers cooperate in the generation and sharing of local labor market information, the development of common definitions, and the promotion of compatible data systems which will serve the whole community and facilitate joint planning and coordination.
- (4) The JTPA program may have additional coordination responsibilities delegated by recent welfare reform initiatives, including the Personal Responsibility and Work Opportunity Act of 1996, Welfare-to-Work Grants to States (Section 5001 of the Balanced Budget Act of 1997), and the CalWORKs program.

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(d) Other (Non-JTPA) Program Responsibilities:

- (1) The Carl D. Perkins Vocational and Applied Technology Education Act (VATEA) requires:
  - (A) The State Vocational Education Plan to describe specific methods and procedures for coordinating vocational education programs and services with programs and services funded under JTPA. [Section 113(b)(14)]
  - (B) Local applications for VATEA funds to describe methods to be used to coordinate vocational education services with relevant programs conducted under JTPA. [Section 204(7)]
  - (C) The State Board of Education to annually provide each PIC in the state with a listing of all programs assisted under the Act in their area. [Section 111(f)]
- (2) Employment and training programs operated by EDD under the Wagner-Peyser Act need to be coordinated as much as possible with JTPA programs operated by SDAs under JTPA. The local EDD JS office(s) and the SDA administrative entity shall jointly plan for the coordinated provision of services to common employers and clients and, as appropriate, jointly develop projects that serve identified community needs.
- (3) Administrators of dislocated worker programs not funded under JTPA, such as the Employment Training Panel, Trade and Commerce Agency, and the JS, shall inform the local SDAs of their intent to operate a dislocated worker program.
- (4) Employment and training programs operated by the State Department of Social Services and County Welfare Agencies may have additional coordination responsibilities delegated by recent welfare reform initiatives, including the Personal Responsibility and Work Opportunity Act of 1996, Welfare-to-Work Grants to States (Section 5001 of the Balanced Budget Act of 1997), and the CalWORKs program.

**JOB TRAINING PLAN REQUIREMENTS**

- (a) The Job Training Plan submitted by a service delivery area to the state will contain assurances of compliance with the coordination requirements found in paragraphs (a)-(c), above. The plan will also

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provide assurance of compliance with the Americans with Disabilities Act, in order to provide appropriate services to individuals with disabilities.

- (b) In accordance with Section 15006(b) of the California Unemployment Insurance Code, each Job Training Plan will contain a certification from the county that the plan is consistent with the county plan to provide employment and training services to public assistance recipients. In the event that a Job Training Plan does not contain the required certification of consistency, the SJTCC will determine if the two plans are consistent and, if appropriate, will authorize the certification of consistency.
- (c) The Job Training Plan will contain descriptions of the following:
  - (1) Agreements reached with other SDAs serving a single labor market area regarding coordination among SDA programs; assessment of needs and problems in the labor market area; and coordinated or joint implementation of job development, placement, and other employer outreach activities.
  - (2) Agreements reached through the planning process with other employment and training and education agencies for jointly funded projects, such as School-to-Career activities, of benefit to common clients or agreements to use resources collaboratively to implement the Job Training Plan.
  - (3) Projects that will be jointly undertaken or funded or in which resources are used collaboratively in accordance with requirements under JTPA Section 104(b)(4), such as One-Stop Career Center System partnerships.
  - (4) Coordination and operational linkages with other federal programs, including other programs funded under JTPA, as required by JTPA Sections 205 and 265.
  - (5) Expected linkages and expected results of these linkages with public or private economic development agencies and general purpose business organizations.
  - (6) Linkages developed between JTPA, JS, local education, and CWD to deliver services to benefit public assistance recipients.

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(7) Coordination activities and agreements reached with agencies serving groups locally determined to have special barriers to employment, including as appropriate, but not limited to:

- Local offices of the Department of Rehabilitation
- The Governor's Committee for the Employment of Disabled Persons
- Department of Aging and their Title V grantees (including Senior Community Employment Programs)
- Area Agencies on Aging and their subcontracted service provider organizations
- The national contractor organizations and/or their contractors under Title V of the Older Americans Act
- Agencies providing services to the homeless
- Agencies providing drug treatment and counseling to substance abusers

(8) Definition of linkage as it applies locally. One of the criteria for approving the Job Training Plan is the adequacy of coordination linkages. Each SDA must comply with the requirements for educational linkages under JTPA Section 265. In addition, each SDA must define linkage as it applies locally. To be considered acceptable, a linkage must clearly enhance the provision of services within the SDA. Therefore, a linkage must involve more than occasional meetings and informal arrangements. The local definition of linkage must include, as a minimum, written operational agreements with other entities, which result in one or more of the following:

- an increase in the total number of persons served in the affected programs;
- a qualitative and quantitative increase in the services provided to participants in the affected programs that is consistent with the needs of the participant;
- arrangements to share client data and other relevant program information;



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- measurable changes in decreasing duplication of services, or in increasing effective use of existing resources between the affected programs;
  - agreements or contractual arrangements to share certain resources and/or costs of training participants in affected programs, consistent with regulations of the affected programs;
  - comprehensive service strategies for participants in the affected programs;
  - formal agreements (monetary or nonmonetary) involving joint planning, service delivery, or other arrangements; and
  - other elements that enhance program services.

The criteria for linkage may include several of the above listed elements. Each linkage within the SDA must be a written operational agreement and must meet one or more of the SDA criteria in order to be considered a “qualifying linkage.”

**2. Describe how, at the planning and operational levels, the State, SDAs, and SSA(s) will coordinate programs under the Carl D. Perkins VATEA of 1990, and the Adult Education Act of 1966, as amended, with JTPA programs offering similar services to the same adult population in order to avoid duplication and expand the range of services.**

Please see the Coordination Criteria shown above pertaining to PIC Responsibilities [B.1.(a)(1)(B) and (D); B.1.(a)(2)]; Other (Non-JTPA) Program Responsibilities [B.1.(d)(1)(A) (B) and (C)]; and Job Training Plan Requirements [(c)(4)].

**3. Describe the measures taken by the state to ensure non-duplication between the Department of Health and Human Services’ State IV-A agencies administering the Temporary Assistance for Needy Families (TANF) program and programs under JTPA Title II in the planning and delivery of services. Include in this section a description of the procedures developed by the state to ensure that the state TANF plan is consistent with the coordination criteria specified in this plan. The description should identify the procedures developed to provide for the review of the TANF plan by the SJTCC.**

As stated above, it is the basic goal of the State of California that all employment, training, and education programs be planned, coordinated, and delivered in a manner that supports the need of California for a highly-

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skilled, well-educated workforce. It is a further goal that these programs, to the degree possible, integrate resources and jointly plan common systems for the provision of nonduplicative services to meet the diverse needs of the eligible population, employers, and the current and emerging workforce. To this end, state law requires that Job Training Plans include a description of how they meet the needs of participants served under the WtW program under the CalWORKs. This includes a description of the agreed upon methods and procedures whereby employment and training services to public assistance recipients are tied to and part of the system of integrated access to public assistance and employment and training services with the county. Counties are required to fully cooperate with PICs to assist in the establishment of appropriate linkages. To assure that this planning has occurred, state law also requires that the county that administers a CalWORKs plan must certify that the Job Training Plan is consistent with the CalWORKs program.

At the State level, the WtW State Partners Work Group, consisting of a number of state entities including the SJTCC, provided advice in preparing the State WtW Grant Program plan, and will continue to meet to facilitate state and local coordination, issue resolution, and joint capacity building to each organization's local constituencies. In formulating the Goals and Objectives and Coordination Criteria contained in this GCSSP, the SJTCC considered the provisions of the TANF program.

The EDD and the California Department of Social Services (CDSS) have formed a Coordination Committee which continues to meet to discuss each Department's issues related to CalWORKs, WtW, JTPA, One-Stop, and other related programs. This will assure that issues are raised and can be resolved early in the implementation process.

**4. *Describe the coordination efforts between the JTPA programs and the Department of Health and Human Services State IV-A agencies in designing and implementing subsidized child care under the Child Care and Development Block Grant Act of 1990.***

Child care is an important supportive service for JTPA participants with dependents. The SDA administrative entities coordinate client child care needs with services offered through programs administered locally by the CDSS, CWDs, or the California Department of Education (CDE). Many SDA entities rely on local Resource and Referral Agencies administered by the CDE (state's lead agency for administering the Child Care and Development Block Grant Act of 1990) to assist them and their clients in obtaining child care services. Local Resource and Referral Agencies provide information to parents about available child care and coordinate community resources for the benefit of parents and local child care

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providers. At the state level, subsidized child care under the Child Care and Development Block Grant program is coordinated through joint planning and issuances with EDD, CDE and CDSS.

**5. *Describe coordination efforts between JTPA programs and the Head Start Programs and services.***

In addition to the overall coordination criteria detailed in this GCSSP, the state has disseminated information to SDA Administrators on the Head Start program encouraging the coordination of the JTPA and Head Start programs and services and providing examples of specific actions the SDA can take to establish linkages with Head Start. The state has also contacted the Head Start Regional Office to exchange information on our respective programs and has urged the SDA entities to establish such contacts at the local level.

**6. *Describe the coordination activities among state and local organizations focusing on the areas of at-risk youth services and literacy programs. This description should specify the name of the coordinating agencies as well as a description of the specific activities being coordinated.***

California's JTPA program is locally driven. Accordingly, the level of coordination and the types of functions being coordinated among state and local organizations focusing on at-risk youth services and literacy programs varies among the state's 52 SDAs. The Governor, through the GCSSP, provides to affected state agencies, local officials, and PICs, specific goals and objectives and coordination criteria to be considered in the formulation of their plans for the delivery of federal and state-funded job training and placement services.

In general, programs serving at-risk populations include remedial education, counseling, peer-focused activities, and work-based work experience. Once the at-risk factors begin to be overcome, such participants can benefit from vocational training and job placement activities. In serving at-risk populations, virtually all SDA administrative entities coordinate training programs with local public and private education institutions, and link with TANF programs and/or local child care agencies to provide increased supportive services to JTPA participants. Additionally, California's School-to-Career Vision (adopted in 1995) provides a framework for partnership building encouraged by the SJTCC for the systemic reform of education and career preparation aimed at improving youths' preparation for postsecondary education or employment.

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**7. Describe how the state will exchange information and coordinate programs between the dislocated worker unit and: state education, training, social services programs, and all other programs available to assist dislocated workers (including the JS and the UI system).**

Information is exchanged and programs are coordinated between the dislocated worker function and state education, training, and social services programs and all other programs available to assist dislocated workers including the JS and the UI system. The JTPD coordinates the delivery of services to dislocated workers with the UI compensation system through the local EDD JS field sites. The SSA administrative entities must coordinate their programs with the local EDD field sites to ensure that the dislocated workers are offered a full array of services available to them. Each year Cooperative agreements are developed between the SSA administrative entities and the EDD field sites to establish the coordinated roles and responsibilities. During rapid response orientations for dislocated workers, the EDD field representatives explain the UI program and job services available to help the workers become reemployed. The JS field site managers participate in statewide Title III planning, as well as local planning. Services available to dislocated workers through EDD include: UI Benefits, California Training Benefits, Trade Readjustment Assistance, NAFTA programs, and Wagner-Peyser programs.

The EDD coordinates with the state's Employment Training Panel (ETP). The ETP funds retraining programs for currently employed workers in businesses facing out-of-state competition, as well as projects promoting job creation and job retention. The ETP participates on the Intergovernmental Workgroup, which works in concert with the SJTCC to develop an integrated and coordinated workforce preparation system for the state. In addition, the ETP has participated in several jointly-funded projects with local PICs.

Coordination under the Carl D. Perkins VATEA will be facilitated by the California Plan For Career Vocational Education. The CDE and the COCCC have developed a plan to address the needs and priorities in career vocational education. The SSA entities are required to coordinate with vocational education programs and this coordination is described in their two-year job training plans.

The JTPD coordinates Title III with targeted veterans' programs. Title III funds will be used to augment the yearly Title IV-C Veterans' Employment Program funds to serve long-term unemployed Title IV-C eligible veterans. The Transitional Assistance Program for personnel leaving the military also has linked their services with many SSA entities and EDD field sites. The

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veterans' representatives in the EDD field sites coordinate with the SSA entities and other Title IV-C service providers.

The SSA entities coordinate locally with applicable social service agencies that can provide services to Title III participants. Examples include child care, personal counseling services and financial counseling services.

**8. *Describe how the State facilitates collaboration with economic development agencies to avert worker dislocations and to assist local communities to develop coordinated responses and obtaining access to economic development or other assistance.***

At the state level, Governor's Reserve funding is used to fund positions with the California Trade and Commerce Agency (TCA). Under this arrangement is the responsibility of that agency to avert worker dislocations and to assist local communities to develop coordinated responses and obtain access to economic development or other assistance. The funded positions are stationed in regional offices throughout the state. The TCA is notified immediately regarding Worker Adjustment and Retraining Notification (WARN) activity. These regional offices collaborate with the rapid response activities of the 52 SDA entities in California.

**9. *Describe how Title III services will be integrated or coordinated with services or payments made available under Chapter 2 of Title II of the Trade Act of 1974 and provided by any state or local agencies designated under Section 239 of the Trade Act of 1974.***

Title III services are integrated and coordinated with services and payments made available under Chapter 2 of Title II of the Trade Act of 1974 and those provided by the state or local agencies designated under Section 239 of the Trade Act of 1974. This integration and coordination is accomplished through a co-enrollment process. Impacted workers apply to the EDD Training Specialists in local sites and are enrolled into the Trade Act Program. The EDD Training Specialists may refer the workers to JTPA service providers. The JTPA service providers enroll workers into JTPA Title III programs and provide assessment, training, and supportive services as needed. Both EDD and JTPA service providers work in partnership to:

- Provide comprehensive services to workers under the Trade Act program and the JTPA Title III program,
- Prevent duplication of services, and
- Provide placement services for workers.

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**10. Describe how services are coordinated with programs administered by the Department of Veterans Affairs and with other veterans' programs such as the Veterans Job Training Partnership Act, Title IV-C of the JTPA, and the Transition Assistance Program of the Department of Defense.**

The JTPD coordinates Title III with targeted veterans' programs. Title III funds will be used to augment the yearly Title IV-C Veterans' Employment Program funds to serve long-term unemployed Title IV-C eligible veterans. The Transition Assistance Program for personnel leaving the military also has linked their services with many SSA entities and EDD field sites. The veterans' representatives in the EDD field sites coordinate with the SSA entities and other Title IV-C service providers.

**11. Describe the coordination efforts between the JTPA Older Individuals program and Title V of the Older Americans Act of 1965.**

In addition to the program coordination efforts discussed in Section II.B. of this GCSSP, the EDD and the California Department of Aging Senior Community Service Employment Program (the State's Title V administrative entity) work cooperatively together to address important issues relative to older workers. The intent of this cooperative relationship is for the two state administrative agencies to work together in the development of innovative coordination endeavors that will sustain and improve the general welfare of older workers statewide.

### **III. PROJECTED USE OF RESOURCES**

**1. Describe the State's administrative activities, including auditing and monitoring to be conducted using the 5 Percent funds allocated to the State for administrative, financial management, and auditing activities.**

The Director of EDD is responsible for JTPA administration in California. Within EDD, there are four Divisions that have responsibility for the major JTPA oversight activities. The JTPD has the primary responsibility for administering JTPA in California. Other oversight Divisions include Audit and Evaluation, Compliance Review, and Investigation.

The SJTCC serves as the Governor's advisory body for promoting coordination of employment and training programs and resources throughout the state. It provides advice and counsel to assist the Governor in planning, coordinating and monitoring the provision of programs and services established under JTPA and under the state's

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JTPA enabling legislation, the Family Economic Security Act (FESA). The SJTCC develops and recommends policy to guide the operation and oversight of JTPA; recommends funding allocations; and certifies that the PICs' job training plans are consistent with the Coordination Criteria in the GCSSP. The SJTCC promotes coordination among state and federal job training, vocational education, job placement, and social service programs operating in California.

Specifically, the SJTCC:

- recommends policy for all aspects of JTPA to the Governor through the state's Secretary of Health and Welfare;
- develops and recommends the GCSSP to the Governor;
- advises the Governor, SDA administrative entities, and the PICs on the consistency of the local job training plans with the GCSSP and recommends approval or modification as appropriate;
- reviews the operation of local JTPA and state employment and training programs in each SDA to determine adequacy, and makes recommendations for improvements to the Governor, chief elected officials, PICs, services providers, the California Legislature, and the public; and
- reviews and comments on the state plans of state agencies providing employment, training, vocational education and related services and makes recommendations to the Governor, the Legislature and appropriate state and federal agencies.

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The specific roles and responsibilities of the four divisions responsible for JTPA oversight within EDD are as follows:

Audit and Evaluation Division (A&ED): The A&ED conducts financial and performance audits, program evaluations, and other analytical studies. The A&ED is responsible for providing audit reports, appraisals, analysis, and recommendations for improving effectiveness and efficiency of JTPA programs in meeting goals and objectives.

Compliance Review Division (CRD): The CRD is responsible for the monitoring oversight of all SDA and other substate grant recipients receiving JTPA funds. The Monitoring Section within the CRD conducts ongoing program and fiscal monitoring, including annual on-site reviews of the procurement practices of SDAs. The monitoring reviews are conducted to ensure program compliance and fiscal integrity in accordance with all applicable federal and state laws, regulations, and policies.

The scope of the monitoring reviews are directed by the CRD Monitoring Guides for various titles and areas of operations. The guides contain all of the JTPA federal and state compliance requirements to which PICs must adhere and provide a structured uniform approach for reviewing and identifying weaknesses or compliance issues. Each monitoring review is conducted in accordance with JTPD established monitoring protocol. This protocol calls for prior scheduling and formal notification to the PIC of the scope of the monitoring review followed by an on-site review, issuance of draft monitoring report of findings, issuance of final monitoring report, and, in coordination with JTPD, follow up to ensure necessary corrective actions are taken or planned.

Investigation Division: The Investigation Division provides investigative services in response to JTPA Incident Reports. This Division is responsible for preserving program integrity and protecting the Governor from the financial obligation that would be incurred if JTPA fraud and abuse were to go undetected or appropriate corrective actions were not taken.

Job Training Partnership Division: The JTPD is responsible for ensuring that the Governor's duty to preserve program integrity and promote program effectiveness is fulfilled. The JTPD reviews the oversight conducted of the PICs and other subrecipients to ensure compliance with key program requirements established in JTPA and related regulations, in state law (FESA), and in state policies.



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The JTPD provides technical assistance, guidance, and support to SDA administrative entities and other subrecipients to resolve audit, federal compliance review, and monitoring findings. The JTPD also maintains liaison with SDA entities to improve program operations and ensure effective policy direction from the state.

## **2. Five Percent Administration Grant for JTPA Title II Programs**

### **(a) Describe the projected use of resources under the Title II 5 Percent grant to be used to provide oversight of program performance, program administration, and program financial management (5 Percent administrative grant).**

The JTPD conducts a resource assessment survey annually to determine the needs of state-level units in meeting administrative and oversight requirements of the JTPA. The process includes, but is not limited to, a zero-based budget process for each entity that has personnel supported with JTPA funds.

In order to ensure fiscal accountability and prevent fraud and abuse in programs administered under the JTPA, the following procurement policy shall apply to all JTPA-related goods and services procured:

- a. Procurements shall be conducted in a manner providing full and open competition, and shall be conducted at intervals of not less than once in every three years.
- b. Procurement of service providers shall, to the extent practicable, be on a competitive basis, and shall require that determinations of demonstrated performance are made in writing prior to any award of a grant, subgrant, contract or subcontract. The determinations of demonstrated performance shall take into consideration those factors described in Title 20 CFR 627.422(d) and (g) of the JTPA Final Rule.

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- c. Small purchase procurement shall be conducted, and rate and price quotations shall be secured, based on the following requirements:

| <u>Dollar range of purchase</u> | <u>Bidder contacts and method</u> |
|---------------------------------|-----------------------------------|
| \$0 to \$999                    | One quote or price*               |
| \$1,000 to \$9,999              | Two documented quotes**           |
| \$10,000 to \$25,000            | Three written quotes**            |

\*This purchase is defined as a small purchase under \$1,000 and not as a noncompetitive or sole source procurement.

\*\*Unless sole source justification exists.

- d. The use of sole source shall be minimized to the extent practicable, but in every case shall be justified. If described and approved in the local job training plan, an SDA entity may sole source to public and nonprofit private secondary schools for those in-school youth programs which require the schools to be the program operator. The procurement of OJT contracts may be conducted noncompetitively. The enrollment of an individual participant in classroom training may be procured noncompetitively if the award of the contract for such enrollment under small purchase procedures, sealed bids or competitive proposals would delay the participant's entry into an available training class.
- e. Procurements shall include an appropriate analysis of the reasonableness of costs or prices.
- f. Procurements shall not provide excess program income or excess profit.
- g. Procurements shall clearly specify deliverables and the basis for payment.
- h. Written procedures shall be established for procurement transactions.
- i. Procurement activities shall be documented in writing.

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- j. Subrecipients shall not use funds provided under the JTPA to duplicate facilities or services available in the area (with or without reimbursement) from federal, state, or local sources, unless it is demonstrated that the JTPA-funded alternative services or facilities would be more effective or more likely to achieve performance goals.
  - k. No subrecipient, contractor or subcontractor shall engage in any conflict of interest, actual or apparent, in the selection, award, or administration of a contract or grant under the JTPA.
  - l. All subrecipients shall conduct oversight to ensure compliance with procurement standards.
  - m. Procurement transactions between units of state or local governments, and any other entities organized principally as the administrative entity for service delivery areas, shall be conducted on a cost reimbursable basis.
  - n. Each subrecipient shall use its own procurement procedures which reflect applicable state and local laws and regulations, provided that the subrecipient's procurement procedures also comply with the requirements of JTPA regulations and with the standards established by the Governor.

The state has issued an audit policy which requires each PIC to submit an audit plan listing its contractors and the method by which audit requirements will be met. The JTPD reviews selected PIC subrecipient audits and their resolution to determine the adequacy of the PIC's actions. State monitors review PIC audits and issue resolution systems on an annual basis to ensure compliance with oversight requirements contained in JTPA and its enabling regulations as well as applicable state and local policies and procedures.

Financial management support is provided by the EDD Fiscal Programs Division through the maintenance of the "Books of Original Entry" and management of the "Electronic Cash Transfer System." The JTPD maintains "Master Subgrants" used to allocate funds to

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PICs and other program operators and provide authority for the expenditure of such funds.

***(b) Describe the state policy for reviewing and approving additional categories of individuals with “serious” barriers to employment in Title II-A and Title II-C. List the SDA’s additional barriers approved by the Governor by program.***

In accordance with JTPA Sections 203(d)(3) and 263(h)(3) which require that information about the Governor’s approval of additional barriers be included in the Governor’s Coordination and Special Services Plan, the state will submit a list of the SDAs’ additional serious barriers approved by the Governor upon completion of the review and approval of the State’s 52 job training plans. The job training plans are due to the State by May 4, 1998.

Pursuant to Sections 203(d) and 263(h) of the JTPA as amended, SDA administrative entities may select one locally applicable serious barrier for the Title II-A adult program and one each for the Title II-C in-school and out-of-school youth programs in addition to those already specified in JTPA. To assist SDA entities in choosing appropriate additional barriers, the State has developed a pre-approved listing of barriers from which these administrators may select. The purpose of the pre-approved list is to afford SDA administrative entities the option to select an additional barrier with the pre-approval of the Governor to facilitate program planning and to eliminate the wait for formal approval from the state. The State has also established criteria for the selection and approval of additional barriers not on the State’s pre-approved listing, since the statewide list may not be applicable in all SDAs in the State. Additional barriers are reviewed and approved based on these criteria. Attachment I includes a listing of the state-approved additional barriers to employment as well as the criteria for state’s approval of additional barriers.

***3. Five Percent Older Workers Program***

***(a) Describe the types of training and participant support activities to be funded with services for older individuals (5 Percent) funds. Include performance goals.***

Pursuant to JTPA Section 204(d), the types of training and participant support activities funded with 5 Percent funds are in accordance with each PIC’s job training plan and are designed to ensure the training and placement of older individuals in employment opportunities with private business concerns. The specific

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performance goals adopted for serving older workers vary from PIC to PIC depending on the demands of the local labor market and economy.

***(b) Describe the State's consultation with the PICs when providing services to older workers.***

At the local level, the State's procedures for accomplishing consultation with the PIC when providing services to older individuals is assured by requiring, through the Governor's Coordination Criteria, that PICs be involved in all stages of program planning, policy setting, oversight, evaluation, and implementation to ensure that JTPA programs (including services to older individuals) reflect the needs of the employer community and that training is provided in demand and growing occupations. The State requires that local job training plans document the PIC's role in program planning, policy setting, oversight, evaluation, and implementation. At the state level, consultation with the SDA/PIC on issues related to providing services to older individuals is accomplished through the solicitation of input from SDAs/PICs on the Governor's Task Force on Older Workers, and the SDA Policy Advisory Group.

***(c) Describe the State's definition for additional categories of individuals with "serious" barriers to employment in the Older Workers Program.***

The JTPA (Section 204(d)(5)(B)) and the Final Rule (Section 628.320(d)) establish that up to 10 percent of the participants receiving services for older individuals may be noneconomically disadvantaged if they have serious barriers to employment and have been determined within the last 12 months to meet the income eligibility requirements for Title V of the Older Americans Act of 1965. The JTPA Final Rule also requires the Governor to identify those serious barriers to employment for the purpose of determining the eligibility of noneconomically disadvantaged persons to receive JTPA services for older individuals.

In accordance with this requirement, older individuals who are not economically disadvantaged but who have been determined, within the 12 months prior to eligibility determination, to meet the income eligibility requirements for Title V of the Older Americans Act of 1965, may be eligible for JTPA services available under JTPA Section 204(d) if they also have one or more barriers, including but not limited to, the following:

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- Basic skills deficient
  - School dropout
  - Recipient of cash welfare payment
  - Disabled
  - Offender
  - Homeless
  - Limited English language proficient
  - Displaced homemaker
  - Veteran
  - Alcoholic
  - Addict
  - Non-cash welfare recipient
  - Resident of public housing
  - Migrant or seasonal farm worker
  - Victim of family violence or disruption
  - Resident of a high crime or high poverty area identified by the PIC
  - Single parent or grandparent with dependent children under age six

#### **4. *Eight Percent State Education Coordination and Grants***

- (a) *Identify the state education agencies responsible for education and training that will be the recipients of these funds.***
- (b) *Describe the projects to be funded.***
  - (i) *The activities and services that will result in increasing the number of youth staying in or returning to school and graduating from high school or the equivalent;***
  - (ii) *The work based curriculum that will link classroom learning to work site experience and address the practical and theoretical aspects of work;***
  - (iii) *The opportunities that will be made available to participants to obtain career path employment and post-secondary education.***
- (c) *Describe the anticipated agreements and the agencies, administrative entities, and SDAs with whom the agreements***

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*will be made. If unable to reach agreements, describe the circumstances.*

- (d) Describe any planned activities to support the Human Resource Investment Council (HRIC) that meet the Title VII requirements and include the programs at Section 701(b)(2)(A).*
- (e) Describe any planned activities to support the State Council, if established before January 1, 1992, which carries out similar functions of the HRIC.*
- (f) Describe how the state will provide adequate resources to meet the match requirements for the 8 Percent funds.*

Information regarding the State Education Coordination and Grants (SECG) funding and projects is being compiled by the California Department of Education in conjunction with the COCCC. This information will be transmitted to DOL as an addendum to this GCSSP.

**5. Five Percent Grant for Capacity Building, Technical Assistance, and Incentive Awards**

- (a) Describe how the State has involved SDAs in planning the use of capacity building and technical assistance.*

The state uses a Capacity Building Work Group (CBWG) to develop a recommended state capacity building and technical assistance system. The CBWG is comprised of four SDA Administrators and staff from the JTPD.

- (b) Describe any requirements the State may have developed for the inclusion of capacity building and technical assistance strategy as part of the planning guidance for the preparation of SDA local job training plans.*

The State requires, through its planning guidance issued to SDA Administrators for preparation of local job training plans, that SDA entities describe plans to conduct capacity building and technical assistance activities pursuant to Title 20 CFR 628.240.

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- (c)(1) Specify the percentage of the “5 Percent” funds available under Section 202(c)(1)(B) that will be used for capacity building and technical assistance.**

The State will use thirty-three percent (33) of the 5 Percent funds for capacity building and technical assistance, as permitted under JTPA Sections 202(c)(1)(B) and 262(c)(1)(B).

- (2) Describe specific plans for use of the funds including:**
- (i) providing for capacity building and technical assistance to SDAs and service providers to ensure quality JTPA programs and well trained staff;**
  - (ii) any interstate technical assistance and training arrangements;**
  - (iii) research and demonstration projects as applicable; and**
  - (iv) technical assistance to SDAs failing to meet performance standards.**

The goal of the State's Capacity Building and Technical Assistance system is to enhance the training and employment system's ability to build a quality workforce in California. The State will accomplish this goal through implementation of the capacity building system's three main components: (1) Compliance Training, (2) Practitioner's Skills Enhancement, and (3) Information Dissemination. The audience for this capacity building effort consists of individuals at the national, state, and local levels who are responsible for providing policy direction, planning, oversight, evaluation, and operation of training and employment programs. The capacity building system will expand and enhance past training and technical assistance provided to state, SDA, PIC, and service provider staff.

Each SDA administrative entity that fails to meet performance standards is eligible for a maximum of \$50,000 in technical assistance funds upon approval of a corrective action plan. Technical assistance activities include SDA-to-SDA technical assistance, consultant services available through the Employment Training Network, and regional training workshops.



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- (3) Describe the formula weighing schemes and the performance measures, and the required adjustment methodology to be used in distributing the balance of funds for incentive grants to SDAs. Include in this description the manner in which the out-of-school youth and employment benefits criteria will be incorporated into state incentive policies and criteria which qualify or disqualify SDAs for receipt of incentive funds.**

In order for an SDA to be eligible for an incentive award, at least 65 percent of both the SDA's Title II-A, 77 percent, and Title II-C, 82 percent (combined in-school and out-of-school) terminees receiving services beyond an objective assessment, must be hard-to-serve.

As part of their annual plan, the SDA administrative entity must include: a description of the "quality services" that will be provided for out-of-school youth and how these will be tracked, and the criteria for defining "employer-assisted benefits" and how receipt of said benefits will be tracked. The information gained from the plans and the actual performance results will form the basis for proposed incentive awards for PY 1997, after analysis and recommendation by an SDA/JTPD staff workgroup.

To be disqualified from receipt of an incentive award, an SDA must either fail to achieve the 65 percent "gate" or fail at least three of the six core performance standards.

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#### **IV. PERFORMANCE STANDARDS**

***Include the following:***

- 1. The departure point for each of the Secretary's and state's measures. Include a discussion of the out-of-school youth and employment benefits measures.***
- 2. A description of the methodology to be used to make adjustment to the standards.***
- 3. A description of how determination of an SDA's performance standards will be made by the state.***

(1) California has adopted six mandatory performance standards for PY 1997.

a) Title II-A 77 Percent Program

- |   |  |
|---|--|
| 1) Adult Follow-up<br>Employment Rate   | The total number of adult respondents who were employed (for at least 20 hours per week), during the 13th full calendar week after termination, divided by the total number of adult respondents.<br><br>National Departure Point: 62 percent  |
| 2) Adult Follow-up<br>Weekly Earnings   | Total weekly earnings for all adult respondents who were employed (for at least 20 hours per week) during the 13th full calendar week after termination, divided by the total number of adult respondents employed (for at least 20 hours per week) at the time of follow-up.<br><br>National Departure Point: \$302 |
| 3) Welfare Follow-up<br>Employment Rate | The total number of adult welfare respondents who were employed (for at least 20 hours per week), during the 13th full calendar week after termination, divided by the total number of adult welfare respondents.<br><br>National Departure Point: 56 percent  |

- 
- |                                      |  |
|--------------------------------------|--|
| 4) Welfare Follow-up Weekly Earnings | Total weekly earnings for all adult welfare respondents who were employed (for at least 20 hours per week) during the 13th full calendar week after termination, divided by the total number of adult welfare respondents employed (for at least 20 hours per week) at the time of follow-up.<br><br>National Departure Point: \$262 |
|--------------------------------------|--|

b) Title II-C, 82 Percent Program

- |   |   |
|---|---|
| 1) Youth Entered Employment Rate        | The total number of youth who were employed (for at least 20 hours per week), divided by the total number of youth who terminated, excluding potential dropouts who are reported on the Standardized Program Information Reporting (SPIR) system as remained-in-school and dropouts who are reported (on the SPIR) as returned-to-school.<br><br>National Departure Point: 48 percent |
| 2) Youth Employability Enhancement Rate | Total number of youth who attained one of the employability enhancements at termination, whether or not they also obtained a job, divided by the total number of youth who terminated.<br><br>National Departure Point: 40 percent  |

California has adopted criteria for eligibility for incentive awards for model out-of-school youth and employer-assisted benefits.

In order to qualify for an incentive award for the employer-assisted benefits, an SDA must 1) exceed all four adult core standards; 2) exceed the 65 percent “gate” for hard-to-serve participants; and 3) have 25 percent (rural SDAs) or 37 percent (urban SDAs) of their total terminees employed with benefits.

To qualify for an award for model-out-of-school youth, an SDA must 1) exceed both youth core standards; 2) exceed the 65 percent “gate” for hard-to-serve participants; 3) exceed the 50 percent minimum of service to out-of-school youth; and 4) ensure that 60 percent or more of the total employed out-of-school youth also received an enhancement.

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c) Title II-A, 5 Percent Older Worker Program

California will monitor SDA entity performance on these two non-core measures. No incentives are attached to these measures.

|                            |   |
|----------------------------|---|
| 1) Entered Employment Rate | Total number of individuals who entered employment of at least 20 hours per week at termination, divided by the total terminations. |
|----------------------------|---|

National Departure Point: 58 percent

|                              |  |
|------------------------------|--|
| 2) Average Wage at Placement | Total hourly wage rate of all terminees who entered employment of at least 20 hours per week at termination, divided by the number of terminees who entered employment of at least 20 hours per week at termination. |
|------------------------------|--|

National Departure Point: \$6.35

(2) Adjustments to Performance Standards

Adjustments to performance standards for individual SDAs will be made in accordance with Section 106 of the JTPA and following the guidelines in the DOL's Guide for Setting JTPA Performance Standards. The DOL's multiple regression methodology is used to adjust SDA performance standards for the four Title II-A and the two Title II-C core performance measures adopted. These models take into account local factors that affect performance, such as participant characteristics, program mix, and unemployment rate.

For adjustments beyond the model, if factors not in the models are identified that affect all California SDAs, statewide adjustments will be considered. For individual SDA adjustments, state policy encourages SDA administrators to submit requests for adjustments whenever they believe there are reasonable grounds for adjustments. These requests must include appropriate documentation which is responsive to the intent of the Act and in conformance with widely accepted statistical criteria. Requests must be quantifiable and have a demonstrated relationship to the performance of local programs. Source data must be available upon request, and of public use quality, must be documented clearly, and must be reproducible. Adjustment factors are limited to economic factors, labor market conditions, geographic factors, characteristics of the population to be served, demonstrated difficulties in serving the population, and the type of services to be provided.

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Adjustments may be initiated unilaterally by the state when the DOL regression model produces predicted performance outside the extreme values specified in the DOL Guide for Setting JTPA Performance Standards.

- (3) An SDA is determined to have met a standard if its actual performance meets its regression model's adjusted standard for that performance measure. Conversely, an SDA is determined to have failed a standard if its actual performance does not meet the adjusted standard for that performance measure. The degree by which an SDA exceeds or fails a standard is not a factor.

**4. Describe the State's incentive award policy pursuant to Sections 202(c)(1)(B) and 106(b)(7). Describe how amounts for performance will be determined. Describe how the State's incentive award policy will reward continuous improvement and progress toward systemwide strategic goals.**

To be eligible for an incentive award, an SDA must ensure that at least 65 percent of the Title II-A 77 percent participants and 65 percent of the Title II-C 82 percent participants (in-school and out-of-school combined) receiving services beyond objective assessment are hard-to-serve. The definition of hard-to-serve is drawn from Sections 203(b), 263(b) and 263(d) of the Act. Participants in school-wide projects under Section 263(g) and Title II 5 Percent incentive funded projects are included in the 65 percent calculations.

The SDAs which exceed Title II performance standards and meet the 65 percent hard-to-serve criteria for both the adult and the youth participants, are eligible to receive an incentive award. Eligibility is predicated on SDA compliance with minimum data submission requirements for post program follow-up as specified in JTPA Directive D97-15, Post Program Follow-Up Data Collection and Reporting.

For PY 1997-98, the awards will be made in the following manner:

- SDAs which exceed all six core standards will receive not less than \$135,000 and not more than \$600,000.
- SDAs which exceed five of the six core standards will receive not less than \$100,000 and not more than \$500,000.

The minimum, maximum or overall award amounts may be reduced based on SJTCC recommendations and funding availability.

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Taking into consideration these minimum and maximum amounts, awards will be calculated based on the number of standards exceeded and the size of the SDA's Title II-A 77 percent and Title II-C 82 percent allocations.

An SDA's award may be reduced if that SDA has had funds recaptured in the prior two consecutive program years due to under-utilization.

In addition, there are two additional incentive awards: Employer-Assisted Benefits and Model Out-Of-School Youth Programs. To be eligible for any incentive award, an SDA must ensure at least 65 percent of all Title II-A or II-C participants who received services beyond objective assessment are hard-to-serve. Participants in Title II, 5 Percent incentive-funded programs are included in calculating achievement of this 65 percent requirement. Five percent of the Title II-A incentive funds are reserved for the Employer-Assisted Benefits award, and five percent of the Title II-C incentive funds are reserved for the Model Out-of-School Youth Awards. An equal amount is awarded to each eligible SDA.

#### 1. Employer-Assisted Benefits

In order to qualify for an incentive award in this category an SDA must:

- exceed all four adult core performance standards;
- exceed the 65 percent JTPA compliance requirement for service to Title II-A hard-to-serve participants; and
- if designated rural, 25 percent or more of their total placements must be employed with benefits; or,
- if designated as urban, 37 percent or more of their total placements must be employed with benefits.

#### 2. Model Out-of-School Youth Programs

In order to qualify for an incentive award in this category an SDA must:

- exceed both youth core performance standards;
- exceed the 65 percent JTPA compliance requirement for service to Title II-C hard-to-serve participants;
- exceed a 50 percent minimum of service to out-of-school youth trainees who received services beyond an objective assessment; and,
- ensure that 60 percent or more of their total employed out-of-school youth, who received services beyond an objective assessment, also received an enhancement.

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**5. Describe the procedures the state will use to provide technical assistance to SDAs failing to meet performance standards under the uniform criteria established by the Secretary, pursuant to Section 106(j)(4).**

The State's DAU in the JTPD is responsible for providing training and technical assistance to SDAs relative to cost compliance, funds utilization, post program follow-up, and performance standards systems. The DAU prepares quarterly calculations of performance standards and performance outcomes and annually computes final incentive awards for eligible SDAs.

An SDA at risk of failing performance standards is required to submit a corrective action plan outlining specific steps the SDA will take to improve performance. The DAU analyzes the corrective action plan submitted by the SDA. This process includes negotiating and processing requests (Technical Assistance Plan) for technical assistance funds. State program managers follow up with the SDAs to ensure that the corrective action steps are being followed and that they are effective in improving performance. Technical assistance activities include SDA-to-SDA technical assistance, consultant services, regional training workshops, and on-site visits by state staff.

**6. Describe the state's procedures for imposing reorganization plans on SDAs failing to meet the prescribed number of performance standards for two consecutive years, pursuant to Section 106(j)(4).**

The State's policy for the imposition of reorganization plans upon SDAs for failure to meet performance standards is as follows:

- a. State management and technical assistance strategy shall be aimed at preventing circumstances from arising which will require mandatory SDA reorganization under the provisions of Section 106 of the Act.
- b. Required Section 106 reorganization plans will be developed by the JTPD, taking into consideration input from the affected PICs/Chief Elected Officials as well as the causes of the failure, any extenuating circumstances, and the degree to which relevant performance standards were missed.
- c. All Section 106 reorganization plans will be placed on the agendas of the SJTCC Executive Committee and the full Council for review and comment prior to the Council's recommendation to the Governor. The plan will be implemented upon the Governor's approval.

**V. PROCUREMENT PROCEDURES**

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The State has established procurement procedures which are detailed in JTPA Directive D97-6, dated September 11, 1997. These procedures, along with JTPA monitoring requirements, ensure that:

- The State has implemented the procurement standards established under Section 164(a)(3).
- The State has monitored substate areas and SDAs to ensure compliance with the procurement standards as required under Section 164(a)(4).
- The State has taken appropriate action to secure compliance pursuant to Section 164(a)(5).

This GCSSP contains a detailed discussion of the State's procurement procedures beginning on page 30.

## **VI. CERTIFICATION**

### **A. Procurement Standards**

The State has prescribed and implemented procurement standards in accordance with Section 164(a)(6) of the JTPA.

### **B. Compliance with Section 167 of JTPA**

The State has adequate methods of administration to assure compliance with nondiscrimination provisions of Section 167 of the JTPA. California law requires that prohibitions exist against discrimination on the basis of age, disability, sex, race, color, creed, or national origin. State law further provides complaint and appeal processes for individuals or groups which feel that these requirements have been violated.



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**C. Signature**

***The signature below is that of the Director of the Employment Development Department, who has been designated by the Governor as the signature authority to apply for and receive Job Training Partnership Act grant awards.***



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**RAY REMY**

Director  
Employment Development Department  
P. O. Box 826880  
Sacramento, California 94280-0001

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**5/15/98**

**Date**

## STATE-APPROVED ADDITIONAL BARRIERS TO EMPLOYMENT

| STATE-APPROVED<br>ADDITIONAL<br>BARRIERS      | TITLE II CATEGORY |                        |                            | DEFINITION OF BARRIER   | ACCEPTABLE<br>DOCUMENTATION/<br>VERIFICATION MAY INCLUDE<br>ONE OR MORE OF THE<br>FOLLOWING <sup>1</sup> :   |
|---|-------------------|------------------------|----------------------------|---|--|
|   | Adult             | In-<br>School<br>Youth | Out-of-<br>School<br>Youth |   |  |
| 1. <i>Alternative school student</i>          |                   |                        | X                          | <i>Any youth enrolled in an alternative school setting including schools such as continuation, corrections, court ordered, community, home study, adult education or special education.</i>   | <ul style="list-style-type: none"> <li>• <i>School records, report cards or statement from school</i></li> <li>• <i>Referral from school counselor</i></li> </ul>  |
| 2. <i>At risk of dropping out of school</i>   |                   | X                      |                            | <i>A student who has chronic attendance or discipline problems at school or whose educational achievement is beneath expected levels.</i>   | <ul style="list-style-type: none"> <li>• <i>School records, report cards or statement from school</i></li> <li>• <i>Referral from school staff person, probation officer or other responsible person</i></li> </ul>  |
| 3. <i>Displaced homemaker</i>                 | X                 |                        |                            | An individual who has been providing unpaid services to family members in the home and who has been dependent either on public assistance and whose youngest child is within 2 years of losing eligibility under part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.); or on the income of another family member but is no longer supported by that income; and is unemployed or underemployed and is experiencing difficult in obtaining or upgrading employment. [See Job Training Partnership Act (JTPA) 4(29)] | <ul style="list-style-type: none"> <li>• <i>Authorization for cash public assistance</i></li> <li>• <i>Copy of public assistance check</i></li> <li>• <i>Medical Card or public assistance identification showing cash grant status</i></li> <li>• <i>Death certificate, divorce decree, or letter from applicant specifying abandonment of spouse or family member.</i></li> <li>• <i>Income tax records</i></li> </ul> |
| 4. <i>Limited English language proficient</i> | X                 | X                      | X                          | <i>The inability of an individual, whose native language is not English, to communicate in English.</i>   | <ul style="list-style-type: none"> <li>• <i>Documentation from school or English as a Second Language (ESL) institution</i></li> <li>• <i>School records or statement from school</i></li> <li>• <i>Inability to communicate in English as documented by staff</i></li> </ul>  |
| 5. <i>Older Individual with low income</i>    | X                 |                        |                            | <i>Individuals age 55 or older whose income does not exceed 125% of the Poverty Guideline.</i>  | <ul style="list-style-type: none"> <li>• <i>Driver license</i></li> <li>• <i>Birth certificate</i></li> <li>• <i>Passport</i></li> <li>• <i>Social Security records</i></li> <li>• <i>Income tax records</i></li> <li>• <i>Bank statements</i></li> <li>• <i>Public assistance records</i></li> </ul>  |

<sup>1</sup> The Department of Labor Technical Assistance Guide (TAG) on eligibility documentation also contains numerous forms of acceptable documentation which would satisfy the requirement for acceptable documentation.

| STATE-APPROVED<br><br>ADDITIONAL<br>BARRIERS  | TITLE II CATEGORY |                    |                        | DEFINITION OF BARRIER  | ACCEPTABLE<br>DOCUMENTATION/<br>VERIFICATION MAY INCLUDE<br>ONE OR MORE OF THE<br>FOLLOWING:  |
|---|-------------------|--------------------|------------------------|--|---|
|   | Adult             | In-School<br>Youth | Out-of-School<br>Youth |  |   |
| 6. <i>Participant in gang activities</i>  | X                 | X                  | X                      | <i>Adult or youth who is involved in organized gang activity as defined by local law enforcement agencies.</i>   | <ul style="list-style-type: none"> <li>• Police report</li> <li>• Referral from law enforcement, probation, social agencies</li> <li>• Referral by community-based gang task force or organization</li> </ul>   |
| 7. <i>Non-cash welfare recipient</i>  | X                 | X                  | X                      | <i>Recipient of non-cash welfare benefits such as Food Stamps or other non-cash benefits</i>   | <ul style="list-style-type: none"> <li>• Food Stamp receipts, cards or letter from Food Stamp disbursing agency</li> <li>• Public assistance records</li> </ul>   |
| 8. <i>Youth who is a member of a family receiving public assistance</i>                                     |                   | X                  | X                      | <i>An individual age 16 through 21 whose family receives public assistance, either in cash or non-cash form regardless of whether the youth is part of the grant. Includes youths in foster care.</i>  | <ul style="list-style-type: none"> <li>• Public Assistance identification card, Medical card, or other welfare agency records</li> <li>• Refugee Assistance Record</li> <li>• Food Stamp receipts, cards or letter from Food Stamp disbursing agency</li> <li>• Court order or court contact</li> <li>• Statement from Foster Care agency</li> <li>• Verification of payments made on behalf of foster child</li> </ul> |
| 9. <i>Resident of high crime area or high poverty area identified by the Private Industry Council (PIC)</i> | X                 | X                  | X                      | <i>Individuals residing in a geographic area within the SDA identified as a high crime or high poverty area which is designated by the PIC as a target area for JTPA services.</i><br><br><i>A high crime area is defined by local law enforcement agencies; and a high-poverty area is measured by the number of persons in poverty according to Census tract data.</i> | <ul style="list-style-type: none"> <li>• Proof of residency such as current driver license; utility bills or other appropriate mailings to individual or individual's family at the claimed home address; Housing Authority verification; landlord statement; letter from social service or public assistance agency.</li> </ul>  |
| 10. <i>Resident of public housing</i>   | X                 | X                  | X                      | <i>Any individual living in subsidized housing or whose family receives housing subsidies, rent assistance or reduced rent via any federal, state, or local housing program.</i>   | <ul style="list-style-type: none"> <li>• Verification by the agency or organization administering the housing program</li> <li>• Utility bill received at address of specific public housing facility</li> <li>• Statement from the Public Housing Authority that the residence is part of the Public Housing project coupled with standard residence documentation</li> </ul>  |
| 11. <i>Migrant or Seasonal Farmworker</i>   | X                 | X                  | X                      | <i>Adults and youth who are employed, or in the case of youth, whose families are employed, on a seasonal basis in the growth, processing, or transportation of agricultural products.</i>   | <ul style="list-style-type: none"> <li>• Unemployment Insurance (UI) documentation</li> <li>• Wage records</li> </ul>   |

| STATE-APPROVED<br><br>ADDITIONAL<br>BARRIERS                 | TITLE II CATEGORY |                        |                            | DEFINITION OF BARRIER   | ACCEPTABLE<br>DOCUMENTATION/<br>VERIFICATION MAY INCLUDE<br>ONE OR MORE OF THE<br>FOLLOWING:  |
|--|-------------------|------------------------|----------------------------|---|---|
|  | Adult             | In-<br>School<br>Youth | Out-of-<br>School<br>Youth |   |   |
| 12. <i>Single parent with dependent children under age 6</i> | <b>X</b>          | <b>X</b>               | <b>X</b>                   | <i>Single parent (male or female) who is head of a household with one or more dependent children under the age of 6.</i>  | <ul style="list-style-type: none"> <li>• <i>Public Assistance identification card, Medical Card, or other welfare agency records</i></li> <li>• <i>Income tax records</i></li> </ul>  |
| 13. <i>Substance abuser</i>                                  | <b>X</b>          | <b>X</b>               | <b>X</b>                   | <i>Individual with a history of substance abuse, including current or former abuse of either drugs or alcohol.</i>  | <ul style="list-style-type: none"> <li>• <i>Documentation from an organization providing counseling or treatment to drug abusers or alcoholics</i></li> <li>• <i>Referral from appropriate agency or physician</i></li> <li>• <i>Referral by Halfway House</i></li> </ul> |
| 14. <i>Veteran</i>   | <b>X</b>          | <b>X</b>               | <b>X</b>                   | An individual who served in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable [JTPA(4)(27)(A)]. | <ul style="list-style-type: none"> <li>• <i>Military discharge papers (DD214)</i></li> <li>• <i>Documentation from the Veterans Administration</i></li> </ul>   |
| 15. <i>Victim of family violence or disruption</i>           | <b>X</b>          | <b>X</b>               | <b>X</b>                   | <i>A victim of spousal parental, or child abuse or family violence, or a member of a violent or abusive family.</i>   | <ul style="list-style-type: none"> <li>• <i>Police/court records</i></li> <li>• <i>Child welfare shelter referrals</i></li> <li>• <i>Referral by therapists, counselors, or medical personnel</i></li> <li>• <i>Child Welfare Service Referral</i></li> </ul>             |

## CRITERIA FOR STATE'S APPROVAL OF ADDITIONAL BARRIERS

| IF THE PROPOSED BARRIER:   | AND THE PROPOSED BARRIER:  | THEN THE STATE WILL:   |
|--|--|--|
| 1. <i>Is on the state-approved list of additional barriers.</i>  | a. <i>Is a single barrier or</i><br>b. <i>Is combined with:</i><br>1) <i>another barrier on the state-approved list, or:</i><br>2) <i>One or more factors such as economic disadvantage, poor work history, or unemployment or long-term unemployment</i>                    | <i>Approve the category as an additional barrier.</i>  |
| 2. <i>Is not on the list of state-approved additional barriers and is not on the list of categories for hard to serve under §203(b)(1) through (6); §263(b)(1) through (6); or §263(d)(1) through (6).</i> | a. <i>Would meet the definition of barrier to employment or artificial barrier to employment as defined in the JTPA glossary (JTPA Directive 87-7)<sup>2</sup>; has supportable basis in the SDA for inclusion<sup>3</sup>; and can be acceptably documented<sup>4</sup></i> | <i>Approve the category as an additional barrier.</i>  |
|  | b. <i>Is solely comprised of individuals with a poor work history or individuals who are unemployed</i>  | <i>Not approve the category; this is not an acceptable additional barrier because §203(d) and §263(h) prohibit an additional barrier comprised solely of individuals who are unemployed or who have poor work histories.</i> |
|  | c. <i>Cannot be supported by written or acceptable alternative forms of documentation other than self-certification</i>  | <i>Not approve the category; adequate and supportable documentation is necessary to avoid audit exceptions based on inadequate documentation.</i>  |
|  | d. <i>Cannot be adequately addressed or overcome by the services available through the SDA or its peripheral resources</i>   | <i>Not approve as there would be no point in serving people whose barriers cannot be overcome by the services available.</i>   |
| 3. <i>Is included on the list of categories for hard-to-serve under §203(b)(1) through (6); §263(b)(1) through (6); or §263(d)(1) through (6).</i>   |  | <i>Not approve as a category of additional barrier because it is already an authorized barrier.</i>  |

2. **Barriers to Employment:** Any demonstrable characteristic of an applicant that has, in the applicant's opinion, served to limit, hinder or prohibit that person's opportunities for employment and/or promotion. Differentiate from artificial barriers to employment.

**Artificial Barrier to Employment:** Limitations such as age, sex, race, national origin, or physical status in hiring, firing, promotion, licensing, and conditions of employment that are not directly related to an individual's fitness or ability to perform the tasks required by the job.

3. The proposed barrier must be identified as being an employment barrier to potentially eligible Job Training Partnership Act (JTPA) participants within the Service Delivery Area (SDA) and the SDA has evidence for justification.
4. Examples of acceptable documentation can be found in the list of state-approved barriers and in the Department of Labor's (DOL) Technical Assistance Guide on Title II Eligibility Documentation.